

DECLARATION OF JEFFREY O'NEAL MARTIN

QUALIFICATIONS AND INTRODUCTION

1.

My name is Jeffrey O'Neal Martin. I graduated from public school in DeKalb County Georgia, hold a Bachelor's degree in Mathematics and Economics from Vanderbilt University and a Master's degree in Economics from the University of Chicago. I am employed as a consultant on jury pool analysis, a consultant on actuarial issues, and as a consultant to political campaigns on issues related to voting data and projections. My academic research and current work involves the use of computers and statistical procedures to analyze data including Census data and voter registration data. I have been qualified as an expert witness on the procedures used to produce jury pools in Superior Courts in Georgia and South Carolina and in Federal Courts in Georgia, Alabama and Michigan.

2.

I provided to counsel for Dzhokhar Tsarnaev a declaration dated August 22nd, 2014. This declaration provides additional information.

SUMMARY OF FINDINGS

3.

The city of Boston makes up 12.27% of the jury eligible population in the Eastern Division, 11.61% of the Master Jury Wheel and 7.90% of the Qualified Jury Wheel. African-Americans from Boston make up 45.98% of the jury eligible population that is African-American and 31.42% of the Qualified Jury Wheel that is African-American.

4.

In the entire State of Massachusetts, 10.93% of the population age 70 and over is in the labor force. In the Eastern Division, 89.30% of persons age 65 to 74 have no ambulatory difficulty and 72.29% of persons age 75 and over have no ambulatory difficulty.

STATISTICAL AND DATA ANALYSIS

5.

Boston has the largest jury eligible population of the 190 cities or towns in the Eastern Division. The jury eligible population of Boston using the American Community Survey (ACS) 5-Year estimates as of 2012 is 429,939 or 12.27% of the Eastern Division.

6.

Boston has the largest African-American jury eligible population of any city or town in the Eastern Division at 96,694. The percentage of the jury eligible population of Boston that is African-American is 22.49% which is the third highest of any city or town in the Eastern Division and is well above the Eastern Division overall percentage of African-Americans of 6.00%. Of all African-Americans in the Eastern Division 45.98% live in Boston.

7.

Boston has the largest number of persons on the Master Jury Wheel. Boston has 12,683 or 11.61% of the Master Jury Wheel of 109,284. Racial identification for persons on the Master Jury Wheel is not available.

8.

The city and town identification on the Qualified Jury Wheel suffers from some misspellings and interpretations. While the Master Jury Wheel and the Census Bureau includes 190 cities and towns, the Qualified Jury Wheel includes 462 cities and towns.

9.

The number of persons on the Qualified Jury Wheel identified with the city of "BOSTON" or "BOSOTN" is 3,944 or 7.90% of the 49,941 persons on the Qualified Jury Wheel.

10.

3,640 persons of the 3,944 persons from the city of "BOSTON" or "BOSOTN" included a racial identification. 587 or 16.13% identified themselves as African-American. While African-Americans in Boston account for 45.98% of jury eligible African-Americans in the Eastern Division, African-Americans in "BOSTON" and "BOSOTN" represent 31.42% of the African-Americans on the Qualified Jury Wheel from any city or town.

11.

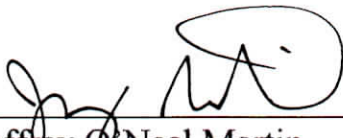
The American Community Survey (ACS) 5-Year estimates as of 2012 supplies labor force participation numbers for the entire State of Massachusetts in Table B23001. The data is not provided for each county in Massachusetts so the numbers for only the Eastern Division are not available. For the 643,647 persons age 70 and over, 70,351 persons or 10.93% are in the labor force.

12.

The American Community Survey (ACS) 5-Year estimates as of 2012 supplies mobility status numbers for the Eastern Division in Table B18105. The age breakdowns do not include age 70 and above but include age 65 to 74 and age 75 and above. For the 319,182 persons age 65 to 74, 285,037 persons or 89.30% have no ambulatory difficulty. For the 277,986 persons age 75 and over, 200,961 or 72.29% have no ambulatory difficulty.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 16, 2014



Jeffrey O. Neal Martin